

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)
Plaintiffs,)
v.) C.A. No. 20-613 (LPS)
ROSS INTELLIGENCE INC.,)
Defendant.)

**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTRE GMBH AND
WEST PUBLISHING CORPORATION'S FIRST SET OF
INTERROGATORIES TO DEFENDANT ROSS INTELLIGENCE INC.**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the United States District Court for the District of Delaware (the “Local Rules” and each a “Local Rule”), Plaintiffs Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively “Plaintiffs”), hereby request that Defendant ROSS Intelligence Inc. (“ROSS” or “You”) answer, separately and fully in writing under oath, the following Interrogatories (“Interrogatories” and each an “Interrogatory”), and serve such answers upon counsel for Plaintiffs, no later than thirty (30) days after service of these Interrogatories.

DEFINITIONS

Unless otherwise defined, all words and phrases used herein shall be accorded their usual meaning and shall be interpreted in their common, ordinary sense. As used in the Interrogatories, the words set forth below shall be defined as follows:

1. The terms “COMMUNICATED” and “COMMUNICATION(S)” should be interpreted in their broadest sense to include without limitation all oral or written

INTERROGATORY NO. 10:

DESCRIBE each iteration of the ROSS PLATFORM, including without limitation how its TECHNICAL FUNCTIONING changed from its first iteration to its last iteration.

INTERROGATORY NO. 11:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for copyright infringement, whether direct or indirect, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

INTERROGATORY NO. 12:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for tortious interference with contract, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

INTERROGATORY NO. 13:

IDENTIFY each PERSON, other than counsel, who was consulted or who provided information or documents in connection with YOUR response to each of these Interrogatories.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Dale M. Cendali

Jack B. Blumenfeld (#1014)
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*Attorneys for Plaintiffs Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

OF COUNSEL:

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Christa C. Cottrell
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Megan McKeown
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609 Main Street
Houston, TX 77002
(713) 836-3600

May 3, 2021

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,) C.A. No. 20-613-LPS
)
Plaintiffs/Counterdefendants,) JURY TRIAL DEMANDED
)
v.) HIGHLY CONFIDENTIAL –
) ATTORNEYS' EYES ONLY
ROSS INTELLIGENCE INC.,)
)
Defendants/Counterclaimant.)

**DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S
RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware (“the Local Rules”), Defendant/Counterclaimant ROSS Intelligence Inc. (“ROSS”) hereby responds the First Set of Interrogatories to ROSS served by Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Co. (collectively, “Plaintiffs”).

These responses are made solely for the purpose of this litigation. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such interrogatories were asked of, or statements contained herein were made by, a witness present and testifying in court, and all such objections are expressly reserved and may be asserted at the time of trial.

ROSS’s responses are based upon information presently available to and located by ROSS. ROSS has not completed its investigation of the facts relating to this case, discovery in this action, or its preparation for trial. The responses given are intended to be without prejudice to ROSS’s

The figure consists of a vertical column of 15 horizontal bars. Each bar is a solid black rectangle. The lengths of the bars vary significantly: the first four bars are very long, extending almost to the top of the frame; the fifth bar is much shorter, ending about halfway down the frame; the sixth bar is very long; the seventh bar is shorter; the eighth bar is very long; the ninth bar is shorter; the tenth bar is very long; the eleventh bar is shorter; the twelfth bar is very long; the thirteenth bar is shorter; the fourteenth bar is very long; and the fifteenth bar is shorter than the previous one.

Interrogatory No. 12:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for tortious interference with contract, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The figure consists of a vertical stack of 15 horizontal black bars. Each bar's length represents a different value or category. The bars are ordered from longest at the top to shortest at the bottom. There is a noticeable gap between the second and third bars from the top.

Interrogatory No. 13:

IDENTIFY each PERSON, other than counsel, who was consulted or who provided information or documents in connection with YOUR response to each of these Interrogatories.

[REDACTED]

[REDACTED]

[REDACTED]

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Gabriel M. Ramsey
Warrington Parker
Kayvan M. Ghaffari
Jacob Canter
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
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By: /s/ Stephanie E. O'Byrne
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Washington, DC 20004
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*Attorneys for Defendant/Counterclaimant
ROSS Intelligence, Inc.*

Dated: July 2, 2021
7285357 / 50241

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,) C.A. No. 20-613-LPS
)
Plaintiffs/Counterdefendants,) JURY TRIAL DEMANDED
)
v.) HIGHLY CONFIDENTIAL –
) ATTORNEYS' EYES ONLY
ROSS INTELLIGENCE INC.,)
)
Defendants/Counterclaimant.)

**DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S
SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFFS'
FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware (“the Local Rules”), Defendant/Counterclaimant ROSS Intelligence Inc. (“ROSS”) hereby supplements its response and objections to the First Set of Interrogatories to ROSS served by Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Co. (collectively, “Plaintiffs”) on May 12, 2021.

These responses are made solely for the purpose of this litigation. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such interrogatories were asked of, or statements contained herein were made by, a witness present and testifying in court, and all such objections are expressly reserved and may be asserted at the time of trial.

ROSS’s responses are based upon information presently available to and located by ROSS. ROSS has not completed its investigation of the facts relating to this case, discovery in this action, or its preparation for trial. The responses given are intended to be without prejudice to ROSS’s

Interrogatory No. 12:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for tortious interference with contract, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Interrogatory No. 13:

IDENTIFY each PERSON, other than counsel, who was consulted or who provided information or documents in connection with YOUR response to each of these Interrogatories.

[REDACTED]

[REDACTED]

[REDACTED]

OF COUNSEL:

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Warrington Parker
Kayvan M. Ghaffari
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POTTER ANDERSON & CORROON LLP

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Bindu A. Palapura (#5370)
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*Attorneys for Defendant/Counterclaimant
ROSS Intelligence, Inc.*

Dated: January 11, 2022
7553340 / 50241

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
)	
Plaintiffs and)	C.A. No. 20-613 (LPS)
Counterdefendants,)	
)	
v.)	<u>HIGHLY CONFIDENTIAL -</u>
)	<u>ATTORNEYS' EYES ONLY</u>
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**PLAINTIFFS AND COUNTERDEFENDANTS THOMSON REUTERS
ENTERPRISE CENTRE GMBH AND WEST PUBLISHING CORPORATION'S
RESPONSES AND OBJECTIONS TO DEFENDANT AND COUNTERCLAIMANT
ROSS INTELLIGENCE INC.'S SECOND SET OF INTERROGATORIES (NO. 13)**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the United States District Court for the District of Delaware (the “Local Rules” and each a “Local Rule”), Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively “Plaintiffs”), hereby respond to Defendant and Counterclaimant ROSS Intelligence Inc.’s (“Defendant”) Second Set of Interrogatories, served on January 7, 2022 (the “Second Set of Interrogatories” and each individually, an “Interrogatory”) in the above-captioned action (“Action”) as follows:

RESPONSES AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 13:

State all facts RELATING TO YOUR contention that ROSS tortuously interfered with the contractual relationship between WEST and LEGALEASE as alleged in Paragraphs 49-53 of the COMPLAINT.

* **BEGIN HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY DESIGNATION ***

A series of 20 horizontal black bars of varying lengths, arranged vertically from top to bottom. The bars are of different widths, creating a visual pattern of alternating long and short segments.

The image consists of a series of horizontal black bars of varying lengths, arranged vertically. The bars are solid black and have thin white borders. They are positioned against a plain white background. The lengths of the bars vary significantly, with some being very short and others being quite long, creating a visual pattern of horizontal lines.

A series of 20 horizontal black bars of varying lengths, arranged vertically from top to bottom. The bars are of equal width but differ in height, creating a visual effect similar to a bar chart or a decorative pattern. The lengths of the bars increase slightly from top to bottom.

Term	Percentage (%)
Organic	78
Natural	92
Artificial	92
Chemical	92
Genetically modified	88
Non-GMO	92
Hydroponics	92
Soilless cultivation	92
Organic fertilizer	92
Organic pest control	92
Organic irrigation	92
Organic seeds	92
Organic soil	92
Organic water	92
GMO	88
Organic food	92

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

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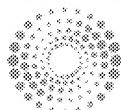
*Attorneys for Plaintiffs and
Counterdefendants Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

February 7, 2022

EXHIBIT E

GENERAL TERMS AND CONDITIONS

Thomson Reuters Legal Products and Professional Services



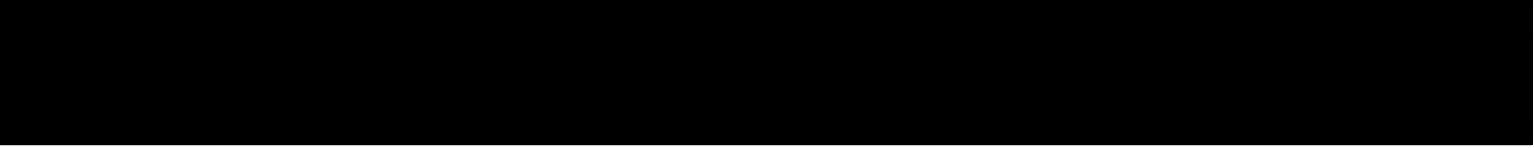
THOMSON REUTERS

EXHIBIT F

From: Thomas Hamilton <thomas@rossintelligence.com>
Sent: Fri, 25 Sep 2015 13:54:06 -0700 (PDT)
To: Andrew Arruda <andrew@rossintelligence.com>; Jimoh Ovbiagele <jimoh@rossintelligence.com>
Subject: Fwd: Re: Ross Intelligence - Demo Practice Point
Attachments: image003.jpg;image003.jpg

----- Forwarded message -----

From: <melissa.pritchard@thomsonreuters.com>
Date: 25 Sep 2015 13:13
Subject: Re: Ross Intelligence - Demo Practice Point
To: <thomas@rossintelligence.com>, <tara.levin@thomsonreuters.com>, <kelly.phillipson@thomsonreuters.com>, <charles.mikesell@thomsonreuters.com>
Cc:



Sent from my iPhone

On Sep 25, 2015, at 12:34 PM, Thomas Hamilton <thomas@rossintelligence.com> wrote:



Regards,



On Fri, Sep 25, 2015 at 11:28 AM, <melissa.pritchard@thomsonreuters.com> wrote:

Hello Thomas



Melissa

Sent from my iPhone

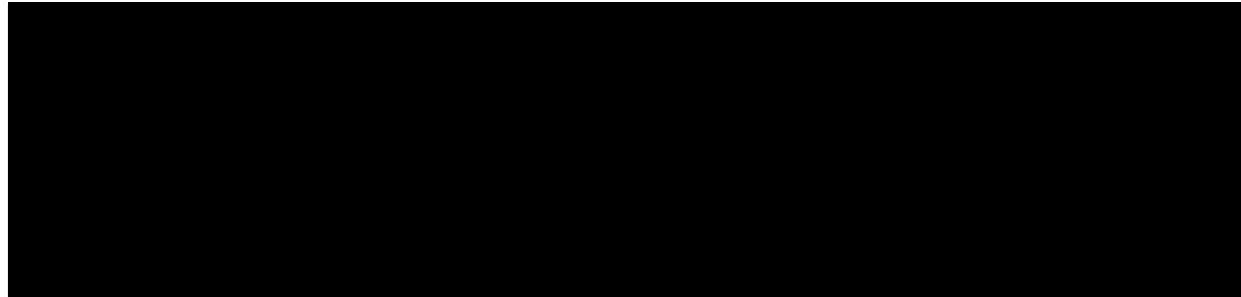
On Sep 25, 2015, at 11:09 AM, Thomas Hamilton <thomas@rossintelligence.com> wrote:



Thomas

On Mon, Sep 21, 2015 at 12:42 PM, <melissa.pritchard@thomsonreuters.com> wrote:

Hello Thomas -



Warmest regards,

Melissa Pritchard

Melissa A Pritchard

| Regional Corporate Consultant - Washington, Oregon, Northern California

| **West, A Thomson Reuters Business** |Phone: [503-750-1699](tel:503-750-1699) | Fax: [1-866-531-0221](tel:1-866-531-0221)|
Melissa.Pritchard@thomsonreuters.com

Westlaw Help (24/7): 1-800-900-WEST (9378)

<image003.jpg>

--
Thomas J. Hamilton
Head of Legal Research
ROSS

D: [+1 650 686 8083](tel:+16506868083)
thomas@ROSSIntelligence.com
[Website](#) | [LinkedIn](#) | [Twitter](#)

--
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D: [+1 650 686 8083](tel:+16506868083)
thomas@ROSSIntelligence.com

[Website](#) | [LinkedIn](#) | [Twitter](#)

EXHIBIT G

Fwd: Legal Research Inquiry

From: Akash Venkat <akashizzle59@gmail.com>
To: thomas@rossintelligence.com; andrew@rossintelligence.com; jimoh@rossintelligence.com
Date: Mon, 21 Sep 2015 03:29:18 +0000

----- Forwarded message -----

From: **Akash Venkat** <akashizzle59@gmail.com>
Date: Sun, Sep 20, 2015 at 8:24 PM
Subject: Re: Legal Research Inquiry
To: Tariq Hafeez <tariq.hafeez@legaleasesolutions.com>
Cc: contact <Contact@legaleasesolutions.com>, Sales <sales@legaleasesolutions.com>

[REDACTED]

Best,
Akash

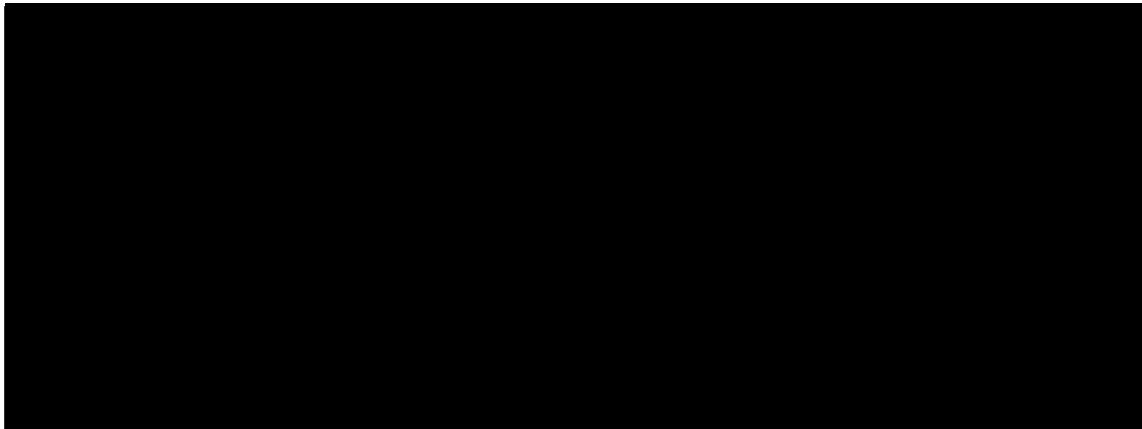
On Sun, Sep 20, 2015 at 8:12 PM, Tariq Hafeez <tariq.hafeez@legaleasesolutions.com> wrote:

[REDACTED]

Best,
Tariq Hafeez, Esq.
Co-founder/President
LegalEase Solutions LLC
2301 Platt Rd, Suite 20
Ann Arbor, MI 48104
(734) 274-2005 Direct

On Sep 20, 2015, at 10:49 PM, Akash Venkat <akashizzle59@gmail.com> wrote:

[REDACTED]



Best,
Akash